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Attorneys for Plaintiffs

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

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In re: Chapter 11

HIGHGATE LTC MANAGEMENT, LLC, Case No: 07-11068 (REL)

Debtor,

-----X

EF CONSULTING LLC and OASIS HC LLC, Adversary Pro. No. 10-90175

Plaintiffs,

v.

GENERAL ELECTRIC CAPITAL
CORPORATION,

Defendant,

-----X

NOTICE OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE THAT, upon the annexed Declaration of Nachum Sherman in support of plaintiffs' for partial summary judgment dated February 7, 2011, and all exhibits annexed thereto, the accompanying Memorandum of Law in Support, and all other papers and proceedings heretofore had herein, plaintiffs, by their undersigned attorneys, will move this Court on February ___, 2011 (the "Hearing Date", before the Honorable Robert E. Littlefield, United States Bankruptcy Court, Northern District of New York (Albany), James T.

Foley Courthouse, 445 Broadway, Suite 330, Albany, New York 12207, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure and Bankruptcy Rule 56, granting plaintiffs EF Consulting LLC's and Oasis HC LTC's Motion for Partial Summary Judgment and entering judgment against General Electric Capital Corporation in the amount of \$2,174,889, plus prejudgment interest, and for such other and further relief as this Court may deem just and proper.

Reponses to Motion shall be filed and served, so as to be received, by no later than _____ at ____.

Dated: New York, New York
February __, 2011

Backenroth Frankel & Krinsky LLP
Attorney for Plaintiffs

By: /s/ Mark Frankel
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